

**NOTICE OF MOTION**

BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

OMNIBUS MOTION TO WITHDRAW AS COUNSEL

CHARLES H Krumbein counsel for the debtor has filed papers with the Court: Seeking to withdraw as counsel of record in this bankruptcy case. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then on or before September 25, 2004, you must File with the court, at the address below, a written request for a hearing or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. The movant Charles H Krumbein believes this motion will be granted shortly after September 25, 2004.

If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough for the court to receive it on or before September 25, 2004. To:

Clerk of Court United States Bankruptcy Court  
1100 E Main Street, Room 310  
Richmond, VA 23219-3515

/S/ Charles H Krumbein  
Charles H Krumbein  
Counsel for the Debtor

Charles H Krumbein, Va Bar No 01234  
Krumbein & Associates, PLLC  
1650 Willow Lawn Drive  
Richmond, Va 23230  
804 673 4358

Certificate of Service  
See certification in motion attached

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

IN Re: Charles H Krumbein

MOTION TO WITHDRAW AS COUNSEL

Comes now Charles H. Krumbein, esq. Counsel of record in the attached list of active cases (Exhibit A filed with case no 04-30160) with this Court and moves to withdraw as counsel of record. Charles H. Krumbein moves this court to strike his appearance as counsel of record on the following terms: The clerk and the chapter 13 trustee shall strike Krumbein as counsel of record immediately in cases which are confirmed and for which no unresolved motion is currently before this court. As cases are confirmed or the motion is resolved the clerk will enter the courts omnibus motion of resignation.

WHEREFORE Charles H Krumbein moves this Honorable Court for an Order striking the appearance of Charles H Krumbein as counsel of record subject to the terms in the proposed order.

/s/ Charles H. Krumbein  
Charles H. Krumbein (Va Bar No 01234)  
Krumbein & Associates, PLLC  
1650 Willow Lawn Drive  
Richmond, VA 23230  
804 673 4350

Certificate of Service

The undersigned hereby certifies that on September 7, 2004 a true and correct copy of the foregoing Motion to WITHDRAW as Counsel was sent by first class mail postage prepaid or electronic delivery to all parties receiving electronic notification on the attached list of case and each debtor (see case number 04-30160 for the complete list of cases)

/s/ Charles H. Krumbein  
Charles H. Krumbein (Va Bar No 01234)

Charles H. Krumbein (Va Bar No 01234)  
Krumbein & Associates, PLLC

1650 Willow Lawn Drive  
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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

IN Re: Charles H Krumbein

ORDER TO STRIKE COUNSEL OF RECORD

This day came Charles H. Krumbein counsel of record in the attached list of cases, and for good cause shown moves this court to resign as counsel of record in the attached list of cases upon the terms included herein: ACCORDINGLY it is

ORDERED ADJUDGED AND DECREED That the clerk shall strike Charles H Krumbein as counsel of record in this case ( a complete list of cases is attached as Exhibit A in case number 04-30160); Mr. Krumbein shall appear and represent debtors whose case is not confirmed or for which a contested matter or adversary proceeding is currently pending before this court.

It is FURTHER ORDERED that Charles H Krumbein is ordered to comply with local bankruptcy rules (cm/ecf) and retain any filed document for which there is a debtor's original signature, and any document hand written by the debtor to support the debtor's answers to the schedules, plan or other filed document (specifically the intake booklet called Bankruptcy Rights and Duties) unless relieved of that duty by subsequent counsel approved by this court.

It is further ordered by This court further relieves the movant Charles H. Krumbein of the duty to mail a copy of this order as entered to each debtor at their address of record because a copy of the proposed order was provided with the motion.

ENTERED \_\_\_\_\_

\_\_\_\_\_  
Judge Douglas O. Tice, Jr.  
Chief Judge United States Bankruptcy Court  
Eastern District of Virginia

I ask for this  
/S/ Charles H Krumbein  
Krumbein & Associates PLLC  
1650 Willow Lawn Drive, Richmond , Va 23230 673 4358